

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



House Dust Contamination Proposed Plan

Tim Drexler
312-353-4367
drexler.timothy@epa.gov

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Removal Update

- Fencing and geotextile fabric removed from excavated areas then reseeded and mulched-May
- Additional removal areas pending negotiations
- Please contact Sonia Vega for additional details:

vega.sonia @epa.gov

651-296-7361

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Site History

- 1958: Wood treating operations begin
- 1984: Site placed on EPA's Priority List
- 1985: Site operations end
- 1986: Site clean up under MPCA begins
- 1995 and 2000: 5 Year Reviews of clean up call for soil testing, risk assessment, and other items
- 2001 and 2003: Soil sampling confirms need for removal on Site area.
- 2004 EPA Orders IP to perform risk assessments

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Human Health and Ecological Risk Assessment Sampling

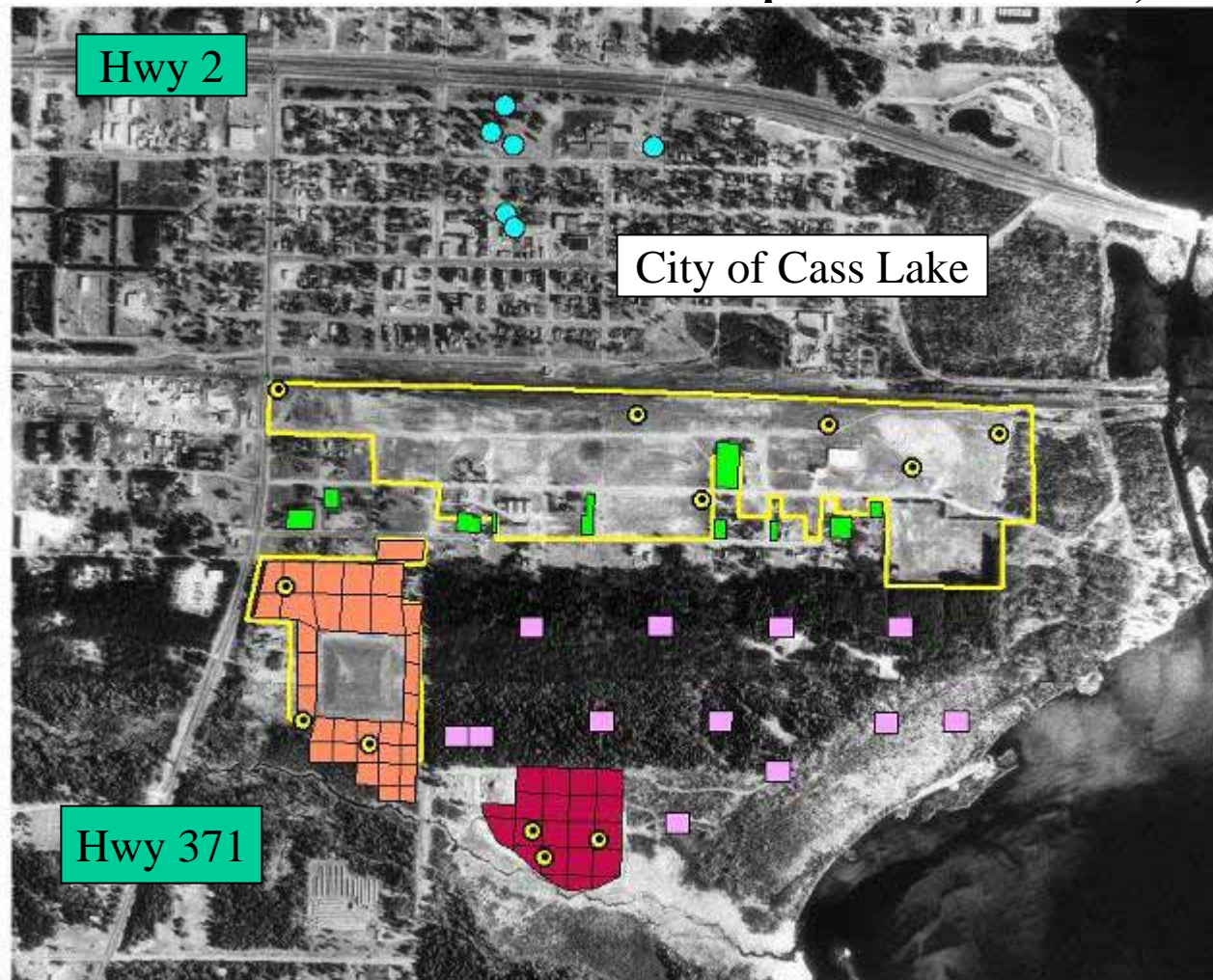
- Sept-Nov. 2004, IP collects over 300 investigative samples and archive samples with EPA oversight
- Full Risk Assessment draft due: Summer 2005

St. Regis Paper Company Superfund Site

Cass Lake, Minnesota



Interim Proposed Plan: June 7, 2005



2004 Risk
Assessment
Soil Sampling



- | | | |
|-------------------|---------------|-----------------------|
| Soil/plant/invert | Resident Dust | Site Operations Areas |
| Reference | City Dump | |
| Chippewa Forest | SW Area | |

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



House dust sampling

- Collection area: residents near St. Regis Site
- Number of residents chosen: 10 homes out of about 40
- Selection basis: Representative range of dioxin soil values in yards from 11 ppt. to 480 ppt.

St. Regis Paper Company Superfund Site Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



- House Dust Collection:
Ten nearby residents



St. Regis Paper Company Superfund Site
Cass Lake, Minnesota



Interim Proposed Plan: June 7, 2005

Partial Sampling Results-Dioxin ppt.

Residence #	Soil (2001)	Dust (2004)
15	45	71.6
14	31.5	54.3
5	11	.234
13	11	11.6
9	210	240
12	33	68.5
16	480	193
20	240	116

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Sampling Results

- Close relationship between soil and dust for dioxin
- Much less apparent relationship between soil and dust for arsenic

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Results interpretation- initial method

- Source: Based on EPA Region 9 Preliminary Remediation Goals for soils
- Method: Uses concentration value
- Residence: Lifetime risk (70 years)
- Results: Two homes over soil screening levels, mostly due to arsenic

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Results interpretation-selected method

- Source: Based on NY World Trade Center
Contaminated Dust Response
- Method: Mass per unit area: takes into consideration
amount of contaminant in a square meter area.
Residence: Lifetime risk (70 years)
- Results: Six homes over screening levels:
 - 5 due to dioxin
 - 4 due to arsenic
 - 3 with both

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Dust Exceedences

Residence #	Dioxin	Arsenic
5		X
9	X	X
14	X	
15	X	
16	X	X
20	X	X

St. Regis Paper Company Superfund Site

Cass Lake, Minnesota



Interim Proposed Plan: June 7, 2005



Residence Results

- Below Level
- Above Level
- Untested Residents
- St. Regis Site

Screening Levels:
(Dioxin: 2 ng/m²,
Arsenic: 0.4 mg/m²)

0.3 0 0.3 Miles

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



What is EPA's response?

- Make an **interim decision** to address house dust contamination while waiting for full risk results

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Interim Proposed Plan Process

- Following Superfund Law and Regulations:
 - Evaluate **list of alternatives** for
 - Protection of human health and environment
 - Compliance with laws
 - Effectiveness and ~~permanence~~
 - Implementability
 - Cost
 - Tribal and State acceptance
 - Community acceptance

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



What options were considered?

- Do nothing (required option under regulations)
- Carpet replacement only for all homes
- Sample remaining homes, then act only to exceedances
- Act on all homes now
- Permanent relocation of all residents

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



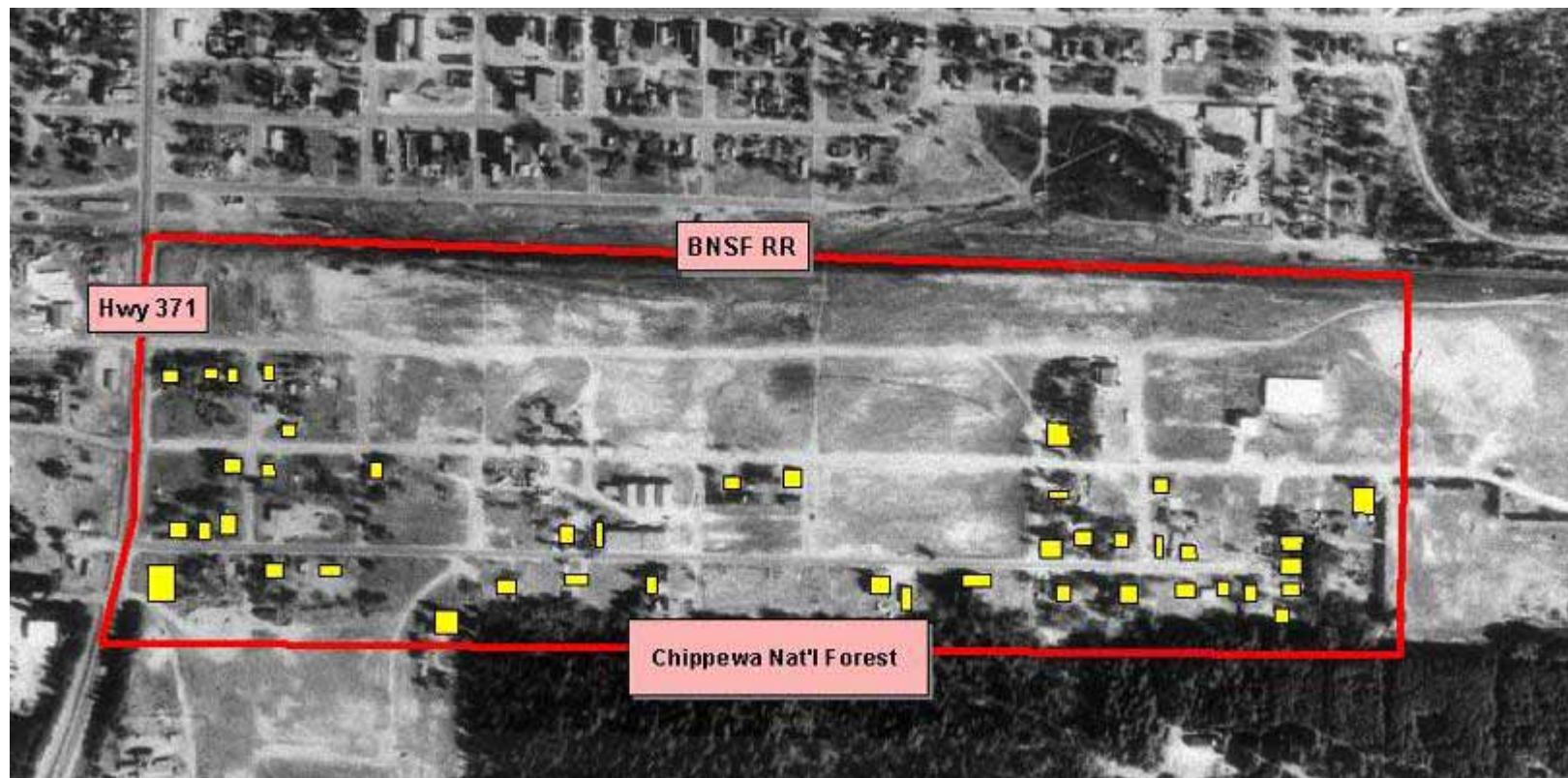
What is EPA's Proposal?

- **Remove/replace carpet** from all homes near site
- Provide **Periodic Housecleaning** until final plan
- **Cover yards** to reduce soil exposure

St. Regis Paper Company Superfund Site

Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Proposed Response Area

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Why Respond Now?

- Waiting for full risk results then final action could take 1 year+
- Results show reason for conservative response
- Action will quickly reduce level of exposure to residents

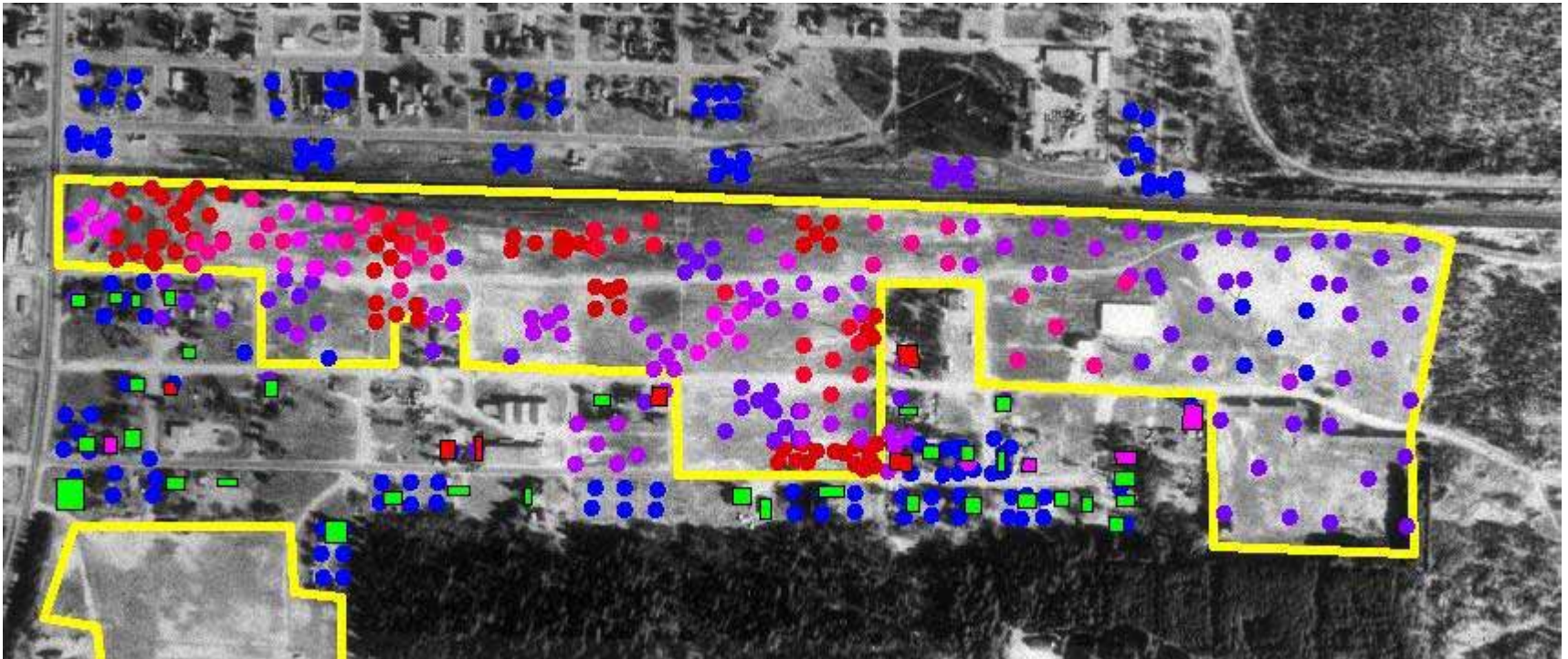
St. Regis Paper Company Superfund Site Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Why only that area?

- Sampling shows soil contaminants limited to area near site.



St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Why All the Homes?

- Sampling gives only a “snapshot”
- Additional evaluation takes more time
 - Crew mobilization
 - Sampling
 - Analysis
 - Interpretation

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Carpet Details

- **Remove/replace carpet from all homes near site**
 - Replace with at least as good as existing carpet
 - Provide 1-2 day housing during the carpeting
 - Provide training to installers to minimize dust

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Housecleaning Details

- **Provide Periodic Housecleaning until final plan**
 - Replace heating/AC filters
 - Clean duct work, drapes, upholstery, rugs, etc.
 - Provide training to cleaners to remove dust
 - Continue until final actions begin

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Yard Cover Details

- **Cover yards to reduce soil exposure**
 - Cover yards with clean soil
 - Seed yards
 - Provide care to ensure growth

St. Regis Paper Company Superfund Site
Cass Lake, Minnesota

Interim Proposed Plan: June 7, 2005



Next Steps

- EPA Accepts comments until July 8th (unless 30 day extension requested)
- EPA will write summary of comments, adjust plan if necessary
- EPA will write Record of Decision
- Responsible party or EPA performs interim work

Estimate to Start of Work: Early Fall